

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	No. 4:09 CR00802ERW
v.)	
)	
HARRY THOMAS,)	
)	
Defendant.)	

MOTION FOR EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS

COMES NOW Counsel for Defendant Harry Thomas, and request an extension of time to file pretrial motions in the above styled cause. In support of said request Defendant states as follows:

1. This case involves allegations of a complex long-term drug conspiracy in which six (6) defendants are named in three counts.
2. The Government estimates that the trial in this case could last several weeks or more depending on the number of defendants electing to proceed to trial.
3. The discovery in this case is voluminous as the investigation extended for a period of several months and includes numerous audio tapes, thousands of pages of documents and more than 18,209 wiretap calls.
4. To date Defendant has not received any discovery from the Government.
5. Defendant anticipates that the evidence relied upon by the Government against him will consist of many arguably suppressible matters and thus he

requires adequate time to review said evidence in detail and file the appropriate motions.

WHEREFORE, for the foregoing reasons defendant requests this Court grant his request for extension of time to file pretrial motions.

Respectfully Submitted,

/s/ Lynne R. Perkins
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was electronically filed this 1st day of March 2010, with the Clerk of the Court to be served by operation of the Court's electronic filing system.